

Jonathan R. Howden (CA State Bar No. 97022)
Lynn R. Fiorentino (CA State Bar Bar No. 226691)
THELEN REID BROWN RAYSMAN & STEINER LLP
101 Second Street, Suite 1800
San Francisco, CA 94105
jhowden@thelen.com
Tel. 415.369.7157
Fax 415.369.8683

Attorneys for Material Witnesses
LIANG XIAN ZHENG,
KONG XIANG HU,
ZONG BIN LI AND
SHUN BIAO ZHAO

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

In Re Material Witness Warrant

Case No.: 07 90552 MISC VRW (JCS)

**RESPONSE OF ALL MATERIAL
WITNESSES TO THE GOVERNMENT'S
MOTION TO EXTEND TIME FOR
DISCLOSING EXPERT WITNESS
SUMMARIES**

**Date: September 18, 2008
Time: 2:00 p.m.
Courtroom: A, 15th Floor**

INTRODUCTION

Material Witnesses Liang Xian Zheng, Kong Sang Hu, Zong Bin Li and Shun Biao Zhao,
by and through their counsel, Jonathan Howden, and joined herein by Material Witnesses Mao Cai
Sun and Hong Zhi Wang, hereby respond to the Government's Motion to Extend Time to Disclose
Summaries of Expert Testimony.

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DISCUSSION

The six Material Witnesses do not object to the delayed disclosure of the summaries of the testimony of the government's experts, but with the singular caveat that the delayed disclosures not contribute to any further delay in the scheduling and taking of the Material Witnesses' Rule 15 depositions. As noted in Captain Sun's Motion To Compel Scheduling of Rule 15 Deposition or for Release, neither the exigencies of pre-trial discovery nor of pre-trial motions practice are principled bases for prolonging the detention of material witnesses.

CONCLUSION

The Material Witnesses do not oppose the requested delayed disclosure, but only if the delay does not further hinder the immediate scheduling and taking of Rule 15 depositions for all of the Material Witnesses.

Dated: September 4, 2008

Respectfully submitted,

THELEN REID BROWN RAYSMAN & STEINER LLP

By /s/ Jonathan Howden
Jonathan Howden, CA Bar No. 97022
Attorney for Material Witnesses Lian Xian Zheng,
Kong Xiang Hu, Zong Bin Li and Shun Biao Zhao